

Pursuant to the Court's scheduling order of January 5, 2012, the Defendant Glenn F. McConnell hereby identifies the expert that he intends to call as an expert at trial of this case:

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Defendant reserves the right to supplement this notice if Plaintiffs' expert report, which is to be filed today, provides any guidance on Plaintiffs' theory of the case—which Plaintiffs have yet to disclose.

Signature Page Follows.

Respectfully submitted,

s/ William W. Wilkins

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Greenville, South Carolina